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SUBJECT: Comoros Explanation Of Economic Citizenship

11. (U) SUMMARY: The Government of the Union of the Comoros provided the Embassy with an official explanation of the implementation of its new "economic citizenship" law. END SUMMARY.

12. (U) Upon our request, the GOC provided an official explanation of how the "economic citizenship" law is being implemented. Applicants are required to submit a file to a Comoran diplomatic mission including: birth certificate, health certificate no older than three months, judicial file no older than three months, and a marriage certificate (if married). The file is passed to Comoran Director of National Security (InterPol liaison) for a security check, before passing on to the Ministry of Justice, where the case is reviewed before being given to Immigration Service to issue the passport. To issue the passport, the GOC requires a piece of identity from the applicant, as well as photos, fingerprints and signature which are entered in a database. In discussing with Comoros Officer, FM Jaffar said the GOC would be "vigilant" in vetting applicants, adding that a commission would make policy not listed in the letter, including about investment requirements and fees.

13. (U) The letter of response also lists several conditions that applicants must meet:

-- Not be a member of a terrorist organization or support principles contrary to Sunni Islam;

-- Not present a threat to the security, peace, social cohesion of Comoran society or identify with religious extremism to the detriment of public order;

-- To be "fully integrated in the social and demographic fabric of his/her country of origin;"

-- Be of good morals;

-- Not be convicted of a crime or misdemeanor against state security, theft, fraud, abuse of confidence, extortion, forgery, crimes against people or immorality;

-- to be known of healthy spirit.

14. (U) Persons acquiring economic citizenship cannot serve in the Comoran military or judiciary, nor can they vote.

15. (SBU) COMMENT: The glaring omission in this GOC explanation is any reference to money. Supposedly this "economic citizenship" is to reassure would-be investors, but if this list of requirements were complete, it should include a minimum investment requirement. President Sambu and other GOC officials have publicly stated that this law will bring "USD 200 million to the Comoros." International media have reported - without any compelling evidence - that Gulf countries have paid the GOC "millions" in return for granting passports to stateless "bidoons." On the other hand, the GOC has long told us that their new law was intended to turn the Comoros

into a haven for foreign investment a la the Cayman Islands, not/not to attract unwanted persons from the Gulf or anywhere else. Having heard their benign explanations again, the proof will be in the pudding. END COMMENT.

MARQUARDT